

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

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| Corinne Voeltz, Plaintiff(s), vs. Bridge Charleston Investments E, LLC and Luxury Simplified, LLC; | Civil Action No.: 2:16-cv-2971-PMD <u>PLAINTIFF'S ANSWERS TO RULE 26.01 DSC INTERROGATORIES</u> |
| Defendant(s) | |

Plaintiff Corinne Voeltz and the undersigned attorneys hereby respond to Local Rule 26.01 Interrogatories as follows:

(A) State the full names, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of such interest.

Answer: United Healthcare has a subrogation interest as Plaintiff's health insurance carrier. To date, the amount of United Healthcare's subrogation interest is \$131,561.30.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Answer: Plaintiff requests a jury trial on all causes of action as a matter of right.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: Plaintiff is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed

(or the basis of any challenge to the appropriateness of the division).

Answer: Plaintiff sustained personal injuries and damages in a premises liability incident that occurred in Folly Beach, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: No.

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